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EMERGENCY & REMEDIAL RESPONSE DIVISION

DATE

11/14/00

TO/OFFICE:

Gwen S Zervas

PHONE NUMBER

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(609) 633-1439

FROM/OFFICE:

Steve Cipot

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(212) 637-4411

COMMENTS:

NUMBERS OF PAGES (Including cover sheet)

346138



NOV 14 2000

Via facisimle and Mail

Gwen Zervas, Case Manager
Bureau of Federal Case Management
Department of Environmental Protection
401 East State Street
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Trenton, New Jersey 08625

Re: Transmittal of Comments on the *Work Plan for Further Off-site Groundwater Investigation at MW19/Hot Spot, L.E. Carpenter, Wharton, New Jersey.*

Dear Ms. Zervas:

Enclosed please find the United States Environmental Protection Agencies (EPA's) comments on the *Work Plan for Further Off-site Groundwater Investigation at MW19/Hot Spot, L.E. Carpenter, Wharton, New Jersey*, dated October 26, 2000.

To begin, EPA greatly appreciates the Potentially Responsible Parties (PRP's) willingness to revisit the hydrology of the MW-19 area, and the new proposal to install three additional monitoring wells so as to verify that contaminants are not migrating offsite and across the street. However, EPA suggests that proposed well MW-19-10 will likely provide only limited useful data and, as outlined in previous discussions and prior comment letters, EPA continues to recommend that a deeper well be installed. The deeper well can be installed instead of MW-19-10, paired with well MW-19-9. Clean samples from this new cluster would represent clear, defensible data that no contaminants are neither sinking nor migrating offsite, and provides for a monitored clean area between the plume and the adjacent residences.

Table 1 appears to have been accidentally omitted from the document. Please forward three copies of this table to my attention.

Page 9 of the text mentions that the sampling method will include purging with a peristaltic pump, with sample collection using a bailer. Numerous studies have shown that sampling with a bailer can produce variable results, often causing a negative bias in

the concentrations of volatiles. The most accurate and reproducible data has been shown to come from purging and sampling with a submersible pump. EPA has previously stated its preference for instituting low flow sampling protocol at the site and would like to restate that opinion here.

Page 9 of the text indicates that data from the study will be used to evaluate the possibility of natural attenuation for the MW-19 area. If this is one of the goals of this study, the work plan should specify types of analyses targeting such an evaluation. The plan should also identify a subset of wells including upgradient, plume and down gradient, to be run for these parameters.

In conclusion, thank you for the opportunity to review and provide comments on this document. Please feel free to contact me at (212) 637-4411, to discuss this matter further.

Yours truly,

Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section

Enclosure

cc: Carole Petersen, Chief
MaryAnne Rosa, Chief
Andy Crossland, PSB
Michael Sivak, PSB

bcc: Stephen Cipot, SNJRS